

**D. REMARKS****Claim Rejections – 35 U.S.C. § 102**

Claims 1-21 stand rejected under 35 U.S.C. 102(c) as being anticipated by Serlet et al. U.S. Patent 6,842,770 (hereinafter “Serlet”). Applicants submit that the pending claims are patentable over the applied art, and overcome each and every rejection, and respectfully submit that the claims are not anticipated by Serlet. “A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed Cir. 1987). Furthermore the reference must be an enabling disclosure of each and every element as set forth in the claim. *In re Hoecksma*, 158 USPQ 596, 600 (CCPA 1968); *In re LeGrive*, 133 USPQ 365, 372 (CCPA 1962). Applicants respectfully request that because the Applicants’ claims are not anticipated by Serlet, the rejection should be withdrawn, and the claims should be allowed.

As will be shown below, Serlet does not teach or enable the methods, systems, and programs as claimed in the present application. Claims 1-21 are therefore patentable and should be allowed. Applicants respectfully traverse each and every rejection individually, and request reconsideration of claims 1-21.

Concerning the rejection of independent claims 1, 7-8, and 19-21, Applicants submit that Serlet does not anticipate the invention defined in these claims, because Serlet does not teach expressly or inherently the elements of claim 1, 7-8, and 19-21, or enable the elements of these claims.

In particular, Serlet does not teach or enable the following elements of claim 1, and the similar elements of claims 7-8, and 19-21:

PATENT  
10/042,007

"program code means for generating a user interface having means for receiving a specified application name, at least one specified search directory, at least one specified target directory, and at least one specified file descriptor", and

"program code means for automatically populating the specified target directory with each file, from the at least one specified search directory, matching the specified file descriptor, when the specified named application is started."

The rejection in the Office Action states that Serlet teaches these limitations. Applicants submit that Serlet does not teach either one these limitations, and instead teaches away from Applicants' claimed invention.

With respect to the rejection of the first element of claim 1, the Examiner asserts that Serlet teaches this limitation at Column 9, lines 63-67 and Column 10, lines 1-13. In that section, Serlet teaches:

"[T]he SFS network access program maintains an array of file descriptors paired with URIs. When a file is opened and the SFS network access program opens a local cache file, in one embodiment, the SFS network access program places the file descriptor together with the specified URI in the next available array element. In such an embodiment, when processing an open file request, the SFS network access program returns the index into the array as a file handle to the SFS plug-in along with a file descriptor. The SFS plug-in uses the file descriptor to access the cached file. In this embodiment, subsequent operations which require activity by the SFS network access program result in the file handle being passed to the SFS network access program by the SFS plug-in such that the SFS network access program identifies the corresponding URI by accessing the array and then communicates with the appropriate remote server." (Col. 9, lines 63-67, and Col. 10, lines 1-13)

Thus, Serlet teaches that the SFS network access program places the file descriptor together with the specified URL when a file is opened. In contrast, Applicants claim "generating a user interface having means for receiving a specified application name, at

PATENT  
10/042,007

least one specified search directory, at least one specified target directory, and at least one specified file descriptor." Nowhere in the section cited in the Office Action (Col. 9, lines 63-67, and Col. 10, lines 1-13), or anywhere in Serlet, is there any hint or suggestion of generating a user interface that would have means to receive an application name, a search directory, a target directory, and a file descriptor as claimed by Applicants.

Furthermore, Serlet teaches away from Applicants' claimed invention by teaching that "the SFS network access program identifies the corresponding URI by accessing the array..." (Col. 10, line 12), and not by receiving the file descriptor as claimed by Applicants.

With respect to the rejection of the second element of claim 1, the Examiner asserts that Serlet teaches this limitation. Applicants submit that Serlet does not teach or enable "automatically populating the specified target directory with each file, from the at least one specified search directory, matching the specified file descriptor, when the specified named application is started" as claimed by Applicants. The rejection in the Office Action cites Serlet (Col. 11, lines 2-45). The cited section first contains a description of file name translation schemes (ASCII or UTF-8) (Col. 10, line 63-Col 11, line 17). This section does not teach or enable, or even give a hint of Applicants' claimed invention. The subsequent section describes "Some SFS Supported Operations" (Col. 11, lines 18-45). Serlet teaches that "the SFS plug-in intercepts file system requests directed to a remote file system, manipulates the arguments, and instructs the local file system to perform a sequence of operations on the locally stored cached file corresponding to a requested remote file or remote directory." (Col. 11, lines 24-30). Again, Serlet does not provide even a hint of populating a specified target directory with each file that results from searching a directory to find a matching file descriptor, particularly when a specified named application is started, as claimed by Applicants. The teaching of Serlet wherein "[w]hen opening a remote file, the open command causes the SRS network access program to create a cache file..." (Col. 11, lines 30-32) falls far short of teaching Applicants' claimed invention.

PATENT  
10/042,007

Therefore, Applicants respectfully request that since Serlet does not teach, suggest, or enable the elements of Applicants' claim 1, and similar elements in claims 7-8, and 19-21, then these claims are not anticipated, and the rejection should be withdrawn, and claims 11, 7-8, and 19-21, should be allowed.

Responsive to Examiner's rejection of claims 9 and 10, Applicants submit that the response above to the rejection of claim 1 overcome the rejections of claims 1, 9 and 10. Furthermore, Applicants submit that Serlet does not teach the following elements of claim 9, and similar elements in claim 10:

"generating a selectable icon for a named application in conjunction with a programming tool";

"displaying, from the programming tool, a graphical user interface having means for receiving a specification of the at least one other directory, at least one file descriptor, a specification of the one directory, and a specific application name";

"automatically populating the specified one directory with each of the plurality of files, from one of the specified at least one other directory, matching the at least one file descriptor, and launching the named application, when the selectable icon is selected", and

"accessing each of the plurality of files from the specified one directory when the specified named application is executing."

The only mention of an "icon" in Serlet is in connection with starting the SFS startup program, where Serlet teaches "[t]he user may execute the SFS startup program according

PATENT  
10/042,007

to any method known to those skilled in the art, including, but not limited to, pull down menus or desktop icons" (Col. 5, lines 29-32). Serlet makes no further mention on the use of icons, and does not teach Applicants' claimed invention of "generating a selectable icon for a named application in conjunction with a programming tool." Therefore, Applicants respectfully request allowance of claims 9 and 10.

Furthermore, Serlet does not teach the other elements of claim 9 and similar elements of claim 10. In particular, Serlet does not teach displaying a graphical user interface that could be used to receive a specification of another directory, a file descriptor, a specification to a directory, and a specified application name as claimed by Applicants. Also, Serlet does not teach populating one directory from another specified directory with a list of matching files, and launching a named application when a selectable icon is selected, as claimed by Applicants. In addition, Serlet does not teach accessing the files from a specified directory when the application is running as claimed by Applicants. Regarding this last element, Serlet teaches away from Applicants' claimed invention by using the SFS cache, and that "[s]uch caching is hidden from the SFS user" (Col 9, lines 14-15), instead of accessing files from a specified directory (instead of hidden) when the application is running. Therefore, Applicants submit that Serlet does not teach Applicants' invention as defined in claims 9 and 10, and respectfully request allowance of claims 9 and 10.

Responsive to Examiner's rejection of claims 2, 5 and 11, Applicants respectfully submit that Serlet does not teach "automatically moving each file, from the at least one specified search directory, matching the specified file descriptor, into the specified target directory when the specified named application is started." Serlet teaches that "SFS issues a WebDAV PROPFIND request for all properties using the directory URI and specifying a header depth of one. In response, the WebDAV/HTTP server returns the specified properties of all the items in the collection, that is, all files in the directory on the server" (Col. 11, lines 52-58)(emphasis added). Thus, according to Serlet, the properties of all

AUS9-2001-0030US1

14

PATENT  
10/042,007

files are returned, therefore teaching away from returning only the files matching the specified file descriptor as claimed by Applicants. In addition, Serlet teaches that when “Opening and Closing Directories and Files...the SFS plug-in serves as a pass through file system...the SFS plug-in intercepts file system requests directed to a remote file system, manipulates the arguments, and instructs the local file system to perform a sequence of operations on the locally stored cache file...” (Col. 11, lines 23-29). Thus, Serlet teaches away from Applicants’ claimed invention by performing “[t]he sequence of actions taken by SFS to open a directory...the SFS network access program issues a... WebDAV/PROPFIND request...” (Col. 11, lines 50-54), instead of moving each file “when the specified named application is started” as claimed by Applicants. In addition, as argued above in Applicants’ response with respect to claim 1, Applicants also submit that the response above to Examiner’s rejection of claim 1 overcome the Examiner’s rejections of claim 1 and dependent claims 2 and 5.

Therefore, Applicants respectfully request allowance of claims 2, 5, and 11, because Serlet does not teach Applicants’ claimed invention, and instead teaches away from it.

Responsive to Examiner’s rejection of claims 3 and 16, Applicants respectfully request allowance of dependent claims 3 and 16 which depend from corresponding claims 1 and 10. As argued above in Applicants’ response with respect to claims 1 and 10, Applicants submit that the response above to the rejection of claim 1 overcome the Examiner’s rejections of claims 1 and 10. Furthermore, Applicants submit that Serlet does not teach the further limitation “automatically copying each file, in the at least one specified search directory, matching the specified file descriptor, to the specified target directory when the specified named application is started.” Applicants’ claimed invention is not found either in the cited reference in Examiner’s rejection of claims 3 and 16 (Col. 11, lines 49-67, and Col. 7, lines 5-30), or anywhere in Serlet. Instead, Serlet teaches away from Applicants’ claimed invention by teaching that “the WebDAV HTTP server

AUS9-2001-0030US1

15

PATENT  
10/042,007

returns the specified properties of all of the items in the collection, that is, all files in the directory on the server" (Col. 11, lines 55-58). Thus, Serlet teaches that the properties of all files are returned, teaching away from copying files that match the specified file descriptor, and only when the named application is started. Furthermore, Serlet teaches that "[i]f the remotely stored file is not cached locally, the SFS plug-in then sends the request to the SFS network access program, as shown in block 526. The SFS network access program processes the request and sends it to the appropriate WebDAV-enabled HTTP server to achieve the requested action, as shown in block 428...The SFS network access program then processes the response and concurrently sends information responsive to the request to the SFS plug-in, as shown in block 536, and caches file information and file data to a local cache" (see Col. 7, lines 5-30). Thus, Serlet teaches that file caching is requested "if the remotely stored file is not cached locally" and not when a named application is started. Again, there is no mention of Applicants' claimed invention, and in particular, there is no mention of copying files that match the specified descriptor when the named application is started.

Responsive to Examiner's rejection of claims 4 and 15, Applicants respectfully request allowance of dependent claims 4 and 15 which depends from corresponding claims 1 and 10. As argued above in Applicants' response with respect to claims 1 and 10, Applicants submit that the response above to the rejection of claim 1 overcome the Examiner's rejections of claims 1 and 10. Furthermore, Applicants submit that Serlet does not teach the further limitation "wherein the at least one specified target directory is a working directory of the specified named application." In the reference cited in the rejection of claims 4 and 15 (Col. 9, lines 15-50) Serlet teaches "...a request to open a file will result in the SFS network access program creating a cache file which contains the contents of the remote file... The SFS cache may be implemented according to any methods known to those skilled in the art" (Col. 9, lines 16-24). Serlet then discusses various known caching techniques ("invisible caching", "parallel hierarchical caching",

AUS9-2001-0030US1

16

and "map caching"). Thus, Applicants submit that the caching techniques described in Serlet do not teach, enable, nor suggest Applicants' invention "wherein the at least one specified target directory is a working directory of the specified named application." Therefore, Applicants respectfully request allowance of claims 4 and 15.

Responsive to Examiner's rejection of claim 6, Applicants respectfully request allowance of dependent claim 6 which depends from claim 1. As argued above in Applicants' response with respect to claim 1, Applicants submit that the response above to the rejection of claim 1 overcome the Examiner's rejections of claim 1 and dependent claim 6. Furthermore, Applicants submit that Serlet does not teach the further limitation in claim 6 "wherein the file descriptor is at least one of a file mask and a general named description" and instead teaches away from Applicants' invention. Serlet teaches "the SFS network access program returns the index into the array as a file handle to the SFS plug-in along with a file descriptor" (Col. 10, lines 4-6). Thus, the SFS network access program returns a file handle along a file descriptor, and not as Applicants' claimed invention wherein the file descriptor comprises a mask and a general named descriptor. Therefore, Applicants respectfully request allowance of claim 6.

Responsive to Examiner's rejection of claim 12-14, Applicants respectfully request allowance of dependent claims 12-14 which depend from claim 10. As argued above in the response with respect to claim 10, Applicants submit that the response overcomes the Examiner's rejections of claim 10 and dependent claims 12-14.

Furthermore, Applicants submit that Serlet does not teach the further limitations of claim 12 "moving back each of the moved files to each one of the specified at least one other directory." Neither of the caching techniques taught by Serlet (i.e., invisible caching, parallel hierarchical caching, and map-caching) (Col. 9, lines 4-64) teach, suggest or enable moving back each of the moved files to a specified other directory under any of

PATENT  
10/042,007

the conditions as claimed by Applicants in claims 12, 13, and 14. Thus, Applicants respectfully request allowance of claims 12-14.

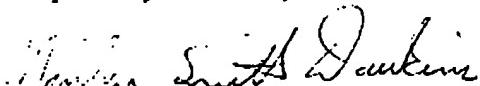
Responsive to Examiner's rejection of claims 17 and 18, Applicants respectfully request allowance of claims 17 and 18. Applicants' responses to the rejections of claims 1, 9, and 10, substantially address similar elements found in claims 17 and 18. Thus, Applicants submit that Applicants' responses above overcome the rejection of claims 1, 9, and 10.

The other prior art references cited by the Examiner also have been considered by Applicants in requesting allowance of the pending claims, and none have been found to teach or suggest Applicants' claimed invention.

### Conclusion

In view of the foregoing, withdrawal of the rejections and the allowance of the current pending claims are respectfully requested. If the Examiner feels that the pending claims could be allowed with minor changes, the Examiner is invited to telephone the undersigned to discuss an Examiner's Amendment.

Respectfully submitted,



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AUS9-2001-0030US1

18

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19